

United States Bankruptcy Court
Northern District of Ohio

In re:
Squirrels Research Labs LLC
The Midwest Data Company LLC
Debtors

Case No. 21-61491-tnap
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0647-6
Date Rcvd: Jul 12, 2024

User: vwaym
Form ID: pdf701

Page 1 of 3
Total Noticed: 13

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 14, 2024:

Recip ID	Recipient Name and Address
db/db	+ Squirrels Research Labs LLC, The Midwest Data Company LLC, 8050 Freedom Avenue NW, North Canton, OH 44720-6912
aty	+ Brouse McDowell, 388 South Main Street, Suite 500, Akron, OH 44311-4419
aty	+ Brouse McDowell, LPA, 388 S. Main Street, Suite 500, Akron, OH 44311-4419
aty	+ Jason R. Schendel, Sheppard, Mullin, Richter & Hampton LLP, Four Embaradero Center, Seventeenth Floor, San Francisco, CA 94111-4106
cr	+ Avnet, Inc., c/o Christopher Combest, Quarles & Brady LLP, 300 N. LaSalle Street, Suite 4000 Chicago, IL 60654-5427
cr	+ Better PC, LLC, c/o Christopher J. Niekamp, Esq., Buckingham, Doolittle & Burroughs, Suite 300, Akron, OH 443338398
acc	+ CliftonLarsonAllen LLP, 388 S Main St, Ste 420, Akron, OH 44311-4407
cr	+ Fleur-de-Lis Development, LLC, c/o Gina Piacentino, 88 E. Broad, Suite 1560, Columbus, OH 43215-3178
fa	+ Inglewood Associates LLC, 9242 Headlands Road, Mentor, OH 44060-1026
cr	+ Premier Bank, 1111 Superior Ave., E., Suite 1111, Cleveland, OH 44114-2568
intp	+ SCEB, LLC, 18 Monument Drive, Stafford, VA 22554-8508
cr	+ Second Foundation Mining LLC, Robert Oxsen, CEO, 3326 Corinthian Ln, Auburn, CA 95603-9066

TOTAL: 12

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	Email/Text: bwclegalbankruptcy@bwc.ohio.gov	Jul 12 2024 20:26:00	Ohio Bureau of Workers Compensation, Attn: Law Section Bankruptcy Unit, PO Box 15567, Columbus, OH 43215

TOTAL: 1

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr		Carl Forsell
cr		Cincinnati Insurance Company
cr		Envista Forensics, LLC d/b/a AREPA
intp		Instantiation LLC
intp		Ohio Power Company dba American Electric Power
intp		Paul Billinger
cr		Torea Consulting Ltd.

TOTAL: 7 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 14, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 12, 2024 at the address(es) listed below:

Name	Email Address
Bryan Sisto	on behalf of Creditor Carl Forsell bsisto@fbtlaw.com
Christopher Niekamp	on behalf of Creditor Better PC LLC cniekamp@bdblawn.com
Christopher Paul Combest	on behalf of Creditor Avnet Inc. christopher.combest@quarles.com
David M. Neumann	on behalf of Creditor Envista Forensics LLC d/b/a AREPA dneumann@meyersroman.com, docket@meyersroman.com;mnnowak@meyersroman.com
Frederic P. Schwieg	on behalf of Trustee Frederic P. Schwieg fschwieg@schwieglaw.com OH84@ecfcbis.com
Frederic P. Schwieg	fschwieg@schwieglaw.com OH84@ecfcbis.com
Frederic P. Schwieg	on behalf of Plaintiff Frederic P Schwieg fschwieg@schwieglaw.com OH84@ecfcbis.com
Jack B. Cooper	on behalf of Defendant Squirrels LLC jcooper@milliganpusateri.com
Jack B. Cooper	on behalf of Defendant Sidney Keith jcooper@milliganpusateri.com
Jack B. Cooper	on behalf of Defendant Kyle Slutz jcooper@milliganpusateri.com
Jack B. Cooper	on behalf of Defendant Jessica Gritzan jcooper@milliganpusateri.com
Jack B. Cooper	on behalf of Defendant David Stanfill jcooper@milliganpusateri.com
Jack B. Cooper	on behalf of Defendant Andrew Gould jcooper@milliganpusateri.com
Jeannie Kim	on behalf of Interested Party Instantiation LLC JeKim@sheppardmullin.com dgmten@sheppardmullin.com
John C. Cannizzaro	on behalf of Interested Party Instantiation LLC John.Cannizzaro@icemiller.com Kelli.Bates@icemiller.com
John G. Farnan	on behalf of Creditor Cincinnati Insurance Company jfarnan@westonhurd.com
Joshua Ryan Vaughan	on behalf of Creditor Ohio Bureau of Workers Compensation jvaughan@amer-collect.com SAllman@AMER-COLLECT.COM;HouliECF@aol.com
Julie K. Zurn	on behalf of Plaintiff Squirrels Research Labs LLC jzurn@brouse.com ckeblesh@brouse.com
Julie K. Zurn	on behalf of Attorney Brouse McDowell LPA jzurn@brouse.com, ckeblesh@brouse.com
Julie K. Zurn	on behalf of Debtor Squirrels Research Labs LLC jzurn@brouse.com ckeblesh@brouse.com
Julie K. Zurn	on behalf of Debtor The Midwest Data Company LLC jzurn@brouse.com ckeblesh@brouse.com

District/off: 0647-6
Date Rcvd: Jul 12, 2024

User: vwaym
Form ID: pdf701

Page 3 of 3
Total Noticed: 13

Kate M. Bradley ust44	on behalf of U.S. Trustee United States Trustee kate.m.bradley@usdoj.gov
Marc Merklin	on behalf of Debtor Squirrels Research Labs LLC mmerklin@brouse.com mmiller@brouse.com
Marc Merklin	on behalf of Plaintiff Squirrels Research Labs LLC mmerklin@brouse.com mmiller@brouse.com
Matthew T. Schaeffer	on behalf of Defendant Fleur-de-Lis Development LLC mschaeffer@baileycav.com, lpatterson@baileycav.com
Matthew T. Schaeffer	on behalf of Defendant Rocco Piacentino mschaeffer@baileycav.com lpatterson@baileycav.com
Matthew T. Schaeffer	on behalf of Creditor Fleur-de-Lis Development LLC mschaeffer@baileycav.com, lpatterson@baileycav.com
Matthew T. Schaeffer	on behalf of Defendant Cynthia Heinz mschaeffer@baileycav.com lpatterson@baileycav.com
Nicholas Paul Capotosto	on behalf of Debtor Squirrels Research Labs LLC ncapotosto@brouse.com tpalcic@brouse.com
Nicholas Paul Capotosto	on behalf of Plaintiff Squirrels Research Labs LLC ncapotosto@brouse.com tpalcic@brouse.com
Paul J. Schumacher	on behalf of Interested Party Ohio Power Company dba American Electric Power pschumacher@dmclaw.com tgross@dmclaw.com
Richard J. Thomas	on behalf of Creditor Premier Bank rthomas@hendersoncovington.com dcambotti@hendersoncovington.com
Robert E. Goff, Jr.	on behalf of Creditor Cincinnati Insurance Company rgoff@westonhurd.com cvadino@westonhurd.com
Steven Heimberger	on behalf of Interested Party SCEB LLC sheimberger@ribllp.com, HeimbergerSR82735@notify.bestcase.com

TOTAL: 34

IT IS SO ORDERED.

Dated: July 12, 2024



Tiiara N.A. Patton
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:

Squirrels Research Labs LLC and
The Midwest Data Company LLC,

Debtors.

Chapter 11

Case No. 21-61491 (TNAP)

Judge Tiiara N.A. Patton

ORDER STRIKING THE OBJECTION OF SECOND
FOUNDATION MINING LLC, TO THE SETTLEMENT AGREEMENT
AND MUTUAL RELEASE FILED BY DEBTOR SQUIRRELS
RESEARCH LABS, LLC (DOC. 323)

On April 9, 2024, Squirrels Research Labs LLC and The Midwest Data Company LLC (“Debtors”) filed the *Motion of Squirrels Research Labs LLC and the Midwest Data Company LLC for Entry of an Order Approving Compromise and Settlement with Cincinnati Insurance Company* (ECF Docket No. 323), requesting entry of an order approving the settlement of a controversy between Debtors and Cincinnati Insurance Company. On April 26, 2024, the *Objection of Second Foundation Mining LLC, to the Settlement Agreement and Mutual Release*

Filed by Debtor Squirrels Research Labs, LLC (Doc. 323) (ECF Docket No. 327) (the “Objection”) was filed by Robert Oxsen, who identifies himself as CEO of Second Foundation Mining LLC.

On May 7, 2024, the Court entered the *Order Directing Second Foundation Mining LLC to Cure Certain Filing Deficiencies and to Show Cause Why Its Objection Should Not Be Stricken by Friday, May 17, 2024* (ECF Docket No. 330) (the “Show Cause Order”). In the Show Cause Order, the Court noted that “[t]he certificate of service for the Objection is deficient as it does not comply with Local Bankruptcy Rule 9013-3.” The Court also noted that “the Objection was submitted by Robert Oxsen, CEO of Second Foundation, who is not an attorney, on behalf of Second Foundation,” and “‘that a corporation may appear in the federal courts only through licensed counsel.’ Rowland v. California Men’s Colony, Unit II Men’s Advisory Council, 506 U.S. 194, 202 (1993) (citing cases).” The Court directed Second Foundation Mining LLC to cure the filing deficiency by Friday, May 17, 2024, and also to file an appropriate pleading to show cause why the Objection should not be stricken for not being filed by an attorney. To date, Second Foundation Mining LLC has failed to cure the deficiency or to file any pleading. Accordingly, upon review of the record and Second Foundation Mining LLC’s failure either to cure the noted deficiency or plead and show cause as directed; therefore,

IT IS HEREBY ORDERED THAT:

1. Cause has not been shown by either Mr. Oxsen or Second Foundation Mining LLC; therefore, The *Objection of Second Foundation Mining LLC, to the Settlement Agreement and Mutual Release Filed by Debtor Squirrels Research Labs, LLC (Doc. 323)* (ECF Docket No. 327) is stricken.

###